

December 17, 1997

Mr. William Tans  
Wisconsin Dept. of Natural Resources  
101 S. Webster St.  
Box 7921  
Madison, WI 53707-7921

Mr. B. Wopat  
Army Corps of Engineers, St. Paul District  
190 Fifth Street East  
St. Paul, MN 55101-1638

Crandon Mine Project and Environmental Justice Issues

Dear Mr. Tans and Mr. Wopat:

During the October 1997 Corps of Engineers (COE) governmental conference call, I had promised to send the COE and Wisconsin Department of Natural Resource (WDNR) a copy of the proceedings from the May 1997 National Environmental Justice Advisory Council (NEJAC) meeting held on the Potawatomi Indian Reservation. Ms. Shannon Fenner, WDNR, and Mr. Dave Ballman, COE, were both interested in receiving the proceedings to incorporate pertinent environmental justice concerns into the respective state and federal Environmental Impact Statements. As an outcome of the NEJAC meeting, a resolution was developed, a copy of the draft (the final version is the same as the draft but I do not have a copy of the resolution in its final form at this time) is attached along with a copy of the cover letter from NEJAC to U.S. EPA Administrator, Ms. Carol Browner. NEJAC's resolution is geared towards the EPA but the advice may be applicable to any governmental agency working on this project.

In addition to the potential tribal impacts and concerns raised within CMC's Environmental Impact Report and in other correspondence and reports by others, EPA still has concerns with regard to Environmental Justice issues, as I am sure do both WDNR and COE, over how this project may have a disproportional impact on the Native American population compared to any other local population. In order to have all the appropriate issues included in the state and federal Environmental Impact Statements (EIS's), I suggest that the WDNR and/or the COE host a meeting for the EPA and other interested parties, to discuss Environmental Justice issues for this project, prior to the respective state and federal draft EIS's being released.

I have included a simple map of the Crandon Mine Project area that shows the census blocks within a fifteen mile radius of the proposed mine site. This map shows graphically what has been stated many times during project reviews; that the Native American populations that lie within the project area are directly downgradient (Sokaogon Chippewa Community - Mole Lake Reservation) and downwind (Forest County Potawatomi Community) of the proposed mine site. This map does not include the Menominee Indian Tribe of Wisconsin or the Stockbridge-Munsee Indian Community which are further downstream of the project area. One can visualize from a map such as this that if environmental contamination (surface water, groundwater or air) does occur due to the proposed mine activities, that the minority Tribal populations may and most likely will take the brunt of any unmitigatable release.

I would be glad to assist in the setting up of an Environmental Justice meeting in any way I can and even offer EPA conference rooms in Chicago for such a meeting. If either of you have comments or questions regarding the above, please feel free to contact me at 312-886-7252, or if you have specific concerns regarding general Environmental Justice issues, feel free to contact Ms. Karla Johnson, Regional Environmental Justice Team Manager at 312-886-5593

Sincerely,

Daniel J. Cozza  
Crandon Mine Project Manager  
U.S. Environmental Protection Agency

attachments:

- \* full NEJAC Summary to Tans and Wopat, and specific Crandon Project related pages to cc's
- \* NEJAC Resolution to Ms. Browner
- \* Crandon Mine Project area map showing Native American Population distribution

cc: D. Ballman, COE  
J. Coleman, GLIFWC  
A. McCammon Soltis, GLIFWC  
J. Griffin, Mole Lake  
D. Cox, Menominee  
K. Fish, Menominee  
C. Hansen, FCP  
G. Bunker, SBM  
D. Moe, CMC  
S. Fenner, WDNR  
J. Trick, FWS  
H. Nelson, BIA  
K. Johnson, EPA  
S. Dodge, EPA  
E. Suriano, EPA-HQ  
E. Bell, EPA-HQ  
K. Johnson, EPA, EJ Team